

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

In re:

BRANDON HEITMANN,

Debtor.

\_\_\_\_\_  
MOHAMED SAAD,

Plaintiff,

v.

BRANDON HEITMANN,

Defendant.

Chapter 7

Case No. 24-41956-MAR

Hon. Mark A. Randon

Adv. Pro. No. 24-04375-mar

**PLAINTIFF'S EX-PARTE MOTION FOR LEAVE TO  
FILE MOTION FOR SUMMARY JUDGMENT BRIEF IN EXCESS OF PAGE LIMIT**

NOW COMES Mohamed Saad, ("Plaintiff), by and through his attorneys, OSIPOV BIGELMAN, P.C. and respectfully requests that this Court grant his Ex Parte Motion for Leave to File his Motion for Summary Judgment Brief in Excess of Page Limit (the "Ex Parte Motion").

In support of the Ex Parte Motion, Plaintiff states as follows:

**Jurisdiction and Venue**

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334.

This matter is a core proceeding within the meaning of 28 U.S.C. §157(b)(2).

2. Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The relief sought herein is based on 11 U.S.C. §§ 105(a) and E.D. Mich.

LBR 9014-1(f).

### **Law and Argument**

4. Pursuant to E.D. Mich. LBR 9014-1(f), motions filed in this Court are generally limited to 25 pages in length unless otherwise permitted by the Court.

5. The Plaintiff's Brief in Support of his Motion for Summary Judgment contains pictures (3), tables (2), and a lot of relevant case which caused the brief to reach 30 pages.

6. As such, the Plaintiff needed to exceed the 25-page limit.

7. Plaintiff therefore requests leave to file a Motion for Summary Judgment not exceeding thirty [30] pages in length, which contains pictures, tables, and law citations inside brief, and exclusive of the accompanying exhibits.

8. This request is made in good faith and not for purposes of delay. No prejudice will result to any party as a result of granting this motion.

WHEREFORE, Plaintiff respectfully requests that this Court enter an order Granting leave to exceed the page limitation for the forthcoming Motion for Summary Judgment, not to exceed thirty [30] pages;

Respectfully Submitted:

Dated: August 4, 2025

**OSIPOV BIGELMAN, P.C.**

/s/ Jeffrey H. Bigelman

Jeffrey H. Bigelman (P61755)

Attorneys for Plaintiff

20700 Civic Center Dr. Suite 420

Southfield, MI 48076

(248) 663-1800

[jhb@osbig.com](mailto:jhb@osbig.com)

**EXHIBIT A**

UNITED STATES BANKRUPTCY COURT  
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Case No. 24-41956-MAR

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**ORDER GRANTING PLAINTIFF'S EX-PARTE MOTION FOR LEAVE TO  
FILE MOTION FOR SUMMARY JUDGMENT BRIEF IN EXCESS OF PAGE LIMIT**

THIS MATTER came before the Court on the Plaintiff's Ex Parte Motion for Leave to File Motion for Summary Judgment Brief in Excess of Page Limit (ECF. No. \_\_\_\_). The Court has reviewed the pertinent pleadings and is advised in the premises.

NOW, THEREFORE, IT IS HEREBY ORDERED that the Plaintiff's Ex Parte Motion for Leave to File Motion for Summary Judgment Brief in Excess of Page Limit is GRANTED.

**IT IS FURTHER ORDERED** that Plaintiff is permitted to file a brief in Support of his Motion for Summary Judgment in a length of up to 30 pages, exclusive of exhibits.